

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DIEGO AGUILAR, KENDALL CARNAHAN and
MICHAEL OKAFOR on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

BATON CORPORATION LTD, d/b/a PUMP.FUN, ALON
COHEN, DYLAN KERLER, and NOAH BERNHARD
HUGO TWEEDALE, SOLANA LABS INC., SOLANA
FOUNDATION, JITO LABS INC., JITO FOUNDATION,
ANATOLY YAKOVENKO, RAJ GOKAL, DAN ALBERT,
AUSTIN FEDERA, LILY LIU, LUCAS BRUDER, and
BRIAN SMITH,

Defendants.

Case No.: 1:25-cv-00880-
CM-BCM

Hon. Colleen McMahon

**NOTICE OF MOTION FOR AN ORDER GRANTING ALTERNATIVE SERVICE
AND AN EXTENSION OF TIME TO SERVE CERTAIN DEFENDANTS**

PLEASE TAKE NOTICE THAT, based upon the accompanying Memorandum of Law, Declaration of Max L. Burwick and exhibits thereto, Plaintiffs hereby move this Court for entry of the accompanying proposed Order granting them leave to serve six of the sixteen Defendants, namely Anatoly Yakovenko, Raj Gokal, Lily Liu, Brian Smith, Lucas Bruder, and Jito Labs Foundation by the alternative means set forth therein, and extending their time to do so to twenty (20) days from the date on which the Court authorizes such service.

DATED: August 11, 2025
New York, NY

Respectfully submitted,

By: /s/ Max L. Burwick

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